

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

VOIP-PAL.COM, INC.

Plaintiff,

v.

META PLATFORMS, INC., and  
WHATSAPP, INC.

Defendants.

CIVIL ACTION NO. 6:20-cv-267-ADA

VOIP-PAL.COM, INC.

Plaintiff,

v.

GOOGLE LLC,

Defendant.

CIVIL ACTION NO. 6:20-cv-269-ADA

VOIP-PAL.COM, INC.

Plaintiff,

v.

AMAZON.COM, INC.;  
AMAZON.COM SERVICES LLC; and  
AMAZON WEB SERVICES, INC.,

Defendants.

CIVIL ACTION NO. 6:20-cv-272-ADA

### **JOINT CLAIM CONSTRUCTION STATEMENT**

Under the Scheduling Order (Case No. 6:20-cv-267, Dkt. No. 52), Plaintiff and Defendants submit this Joint Claim Construction Statement with respect to U.S. Patent No. 10,218,606.

#### **I. AGREED-UPON CLAIM TERMS:**

None.

#### **II. DISPUTED CLAIM TERMS:**

<b>Claim Term</b>	<b>Plaintiff's Construction</b>	<b>Defendants' Construction</b>	<b>Proposing Party</b>
“network element(s)”  claims 1, 4, 8, 14, 19-21, 23, 24, 27, 32	Plain and ordinary meaning <sup>1</sup>	Indefinite.  This contrasts with Plaintiff's assertion that the plain and ordinary meaning of “network element(s)” is “a device or component of the communication network associated with at least one IP address.”	Defendants
“identifier(s)”  claims 1, 5, 6, 8, 9, 11, 14, 15, 19, 21, 22, 27, 32, 42, 44	Plain and ordinary meaning	“value with pre-defined format”	Defendants
“first participant profile”  claims 1, 3, 19-21, 42, 44	“stored information specific to a subscriber (first participant) of a communication system”	“information relating to a call participant in a PSTN system”	Joint
“routing message”  claims 1, 8, 14, 19, 21, 26, 27, 32	Plain and ordinary meaning	“a message that includes a callee user name field, a route field, and a time to live field”	Defendants

---

<sup>1</sup> Plaintiff disputes that it has made any assertion about how the plain and ordinary meaning of “network element(s)” should be construed.

<b>Claim Term</b>	<b>Plaintiff's Construction</b>	<b>Defendants' Construction</b>	<b>Proposing Party</b>
"private network" claim 8	"a network for communication that is privately controlled"	Plain and ordinary meaning	Plaintiff
"gateway" claims 14, 26	Plain and ordinary meaning <sup>2</sup>	<p>Plain and ordinary meaning, which is "device that connects networks that use different communication protocols."</p> <p>This contrasts with Plaintiff's assertion that the plain and ordinary meaning of "gateway" is "a device that connects at least two networks."</p>	Defendants

---

<sup>2</sup> Plaintiff disputes that it has made any assertion about how the plain and ordinary meaning of "gateway" should be construed.

Dated: May 6, 2022

Respectfully submitted,

/s/Lewis E. Hudnell, III

Lewis E. Hudnell, III  
[lewis@hudnelllaw.com](mailto:lewis@hudnelllaw.com)  
Nicolas S. Gikkas  
[nick@gikkaslaw.com](mailto:nick@gikkaslaw.com)  
Hudnell Law Group P.C.  
800 W. El Camino Real Suite 180  
Mountain View, California 94040  
T: 650.564.3698  
F: 347.772.3034

**ATTORNEYS FOR PLAINTIFF  
VOIP-PAL.COM, INC.**

/s/ Joshua Glucoft

Michael E. Jones  
State Bar No. 10929400  
[mikejones@potterminton.com](mailto:mikejones@potterminton.com)  
POTTER MINTON  
110 N. College Ave., Suite 500  
Tyler, Texas 75702  
Tel: (903) 597-8311  
Fax: (903) 593-0846 (Facsimile)

Ellisen Shelton Turner (Pro Hac Vice)  
[ellisen.turner@kirkland.com](mailto:ellisen.turner@kirkland.com)  
Joshua Popik Glucoft (CA Bar No. 301249)  
[josh.glucoft@kirkland.com](mailto:josh.glucoft@kirkland.com)  
KIRKLAND & ELLIS LLP  
2049 Century Park East, Suite 3700  
Los Angeles, CA 90067  
Tel: (310) 552-4220  
Fax: (310) 552-5900

Kristina R. Cary  
Massachusetts BBO No. 688759  
[kristina.cary@kirkland.com](mailto:kristina.cary@kirkland.com)  
KIRKLAND & ELLIS LLP  
200 Clarendon Street  
Boston, MA 02116  
Tel: (617) 385-7500  
Fax: (617) 385-7501

**ATTORNEYS FOR DEFENDANTS  
META PLATFORMS, INC. AND  
WHATSAPP, INC.**

/s/ Robert W. Unikel

---

Paige Arnette Amstutz  
State Bar No.: 00796136  
[pamstutz@scottdoug.com](mailto:pamstutz@scottdoug.com)  
SCOTT, DOUGLASS & MCCONNICO,  
LLP  
303 Colorado Street, Suite 2400  
Austin, TX 78701  
Telephone: (512) 495-6300  
Facsimile: (512) 495-6399

Robert W. Unikel (Admitted Pro Hac Vice)  
[robertunikel@paulhastings.com](mailto:robertunikel@paulhastings.com)  
Matthew Lind (Admitted Pro Hac Vice)  
[matthewlind@paulhastings.com](mailto:matthewlind@paulhastings.com)  
PAUL HASTINGS LLP  
71 South Wacker Drive, 45th Floor  
Chicago, IL 60606  
Telephone: (312) 499-6000  
Facsimile: (312) 499-6100

Robert R. Laurenzi (Admitted Pro Hac Vice)  
[robertlaurenzi@paulhastings.com](mailto:robertlaurenzi@paulhastings.com)  
PAUL HASTINGS LLP  
200 Park Avenue  
New York, NY 10166  
Telephone: (212) 318-6000  
Facsimile: (212) 319-4090

Ariell N. Bratton (Admitted Pro Hac Vice)  
[ariellbratton@paulhastings.com](mailto:ariellbratton@paulhastings.com)  
Cole D. Malmberg (Admitted Pro Hac Vice)  
[colemalmberg@paulhastings.com](mailto:colemalmberg@paulhastings.com)  
PAUL HASTINGS LLP  
4747 Executive Drive, 12th Floor  
San Diego, CA 92121  
Telephone: (858) 458-3000  
Facsimile: (858) 458-3005

**ATTORNEYS FOR DEFENDANT  
GOOGLE LLC**

/s/ Daniel T. Shvodian

M. Craig Tyler, Bar No. 00794762

[CTyler@perkinscoie.com](mailto:CTyler@perkinscoie.com)

Perkins Coie LLP

500 W 2nd St, Suite 1900

Austin, TX 78701-4687

Tel. No. 737.256.6113

Fax No. 737.256.6300

Daniel T. Shvodian, Admitted *Pro Hac Vice*

[dshvodian@perkinscoie.com](mailto:dshvodian@perkinscoie.com)

Perkins Coie LLP

3150 Porter Drive

Palo Alto, CA 94304-1212

Tel No. 650.838.4300

Fax No. 650.838.4350

Attorneys for Defendants

**AMAZON.COM, INC.;**

**AMAZON.COM, SERVICES LLC; AND**

**AMAZON WEB SERVICES, INC.**

### **CERTIFICATE OF SERVICE**

The undersigned certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of the forgoing JOINT CLAIM CONSTRUCTION STATEMENT via the Court's CM/ECF system pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5(b)(1) this 6th day of May, 2021.

By: /s/Lewis E. Hudnell, III

Lewis E. Hudnell, III

[lewis@hudnelllaw.com](mailto:lewis@hudnelllaw.com)

Hudnell Law Group P.C.

800 W. El Camino Real Suite 180

Mountain View, California 94040

T: 650.564.3698

F: 347.772.3034